



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 22, 2008

**MEMO ENDORSED**

4/22/08  
Eugene Ingoglia  
time & date  
✓

**BY FACSIMILE: (212) 805-6326**  
The Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Mutholib Sanni and Francia Tabares  
07 Cr. 999 (CM)

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for April 23, 2008, to May 21, 2008, at 11:00 a.m.

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from April 23 through May 21, 2008. The Government makes this request, with the consent of defense counsel, for the Government and the defense to continue to pursue discussions regarding a possible disposition before trial, and to accommodate the schedule of Mr. Murphy, who has been ill.

USDS SDNY	
DOCUMENT	
ELECTRONICALLY FILED	
DOC #:	
FILED:	4/22/08

By:

Respectfully submitted,

MICHAEL J. GARCIA  
United States Attorney

Eugene Ingoglia  
Assistant U.S. Attorney  
(212) 637-1113

cc: Roy Kulcsar, Esq., counsel for Francia Tabares (fax: 201-439-1478)  
John M. Murphy, Jr., Esq., counsel for Mutholib Sanni (fax: 718-448-8685)